DANIEL G. BOGDEN **United States Attorney** 2 **BRIAN PUGH** SARAH E. GRISWOLD **Assistant United States Attorneys** 3 333 Las Vegas Blvd. South, Suite 5000 Las Vegas, Nevada 89101 4 (702) 388-6336 5 Fax: (702) 388-5087 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 11 UNITED STATES OF AMERICA, Case No. 2:10-cr-236-GMN-PAL 12 Plaintiff, STIPULATION FOR PROTECTIVE ORDER 13 VS. CANDIS J. GARDLEY, 14 15 Defendant. 16 17 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, 18 United States Attorney for the District of Nevada, and Brian Pugh and Sarah E. Griswold, 19 Assistant United States Attorneys, counsel for the United States, and Mace J. Yampolsky, counsel for defendant CANDIS J. GARDLEY, that this Court issue an Order protecting from disclosure to 20 21 the public any discovery documents containing the personal identifying information such as 22 account numbers, Social Security numbers, drivers license numbers, dates of birth, telephone 23 numbers, Email addresses, or physical addresses, of participants, witnesses and victims in this 24 case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state 25 as follows: 26 ///

- 1. Protected Documents which will be used by the parties include personal identifiers, including account numbers, Social Security numbers, drivers license numbers, dates of birth, Email addresses, and physical addresses, of participants, witnesses, and victims in this case.
- 2. Discovery in this case is somewhat voluminous. Many of the documents include personal identifiers that may constitute evidence in this case. In addition, redacting the personal identifiers of participants, witnesses, and victims would prevent the timely disclosure of discovery to defendants.
- 3. As part of its discovery production, the United States may provide Protected Documents to Defendant without redacting the personal identifiers of participants, witnesses, and victims, with the possible exception of certain materials it reserves the right to produce in redacted form.
- 4. Access to Protected Documents will be restricted to persons authorized by the Court, namely Defendant, attorneys of record, and their associated counsels, paralegals, investigators, experts, and secretaries employed by the attorneys of record and performing services on behalf of Defendant.
- 5. The following restrictions will be placed on the above-designated individuals unless further ordered by the Court. The above-designated individuals shall not:
- a. make copies for, or allow copies of any kind to be made by any other person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
 - b. allow any other person to read Protected Documents; and
- c. use Protected Documents for any other purpose other than preparing to defend against the charges in the Indictment or any further superseding indictment arising out of this case.
- 6. Defendant's attorneys shall inform any person to whom disclosure may be made pursuant to this order of the existence and terms of this Court's order.

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1	7. The requested restrictions shall not restrict the use or introduction as evidence of
2	discovery documents containing personal identifying information such as account numbers, Social
3	Security numbers, drivers license numbers, dates of birth, telephone numbers, Email addresses,
4	and physical addresses during the trial of this matter.
5	8. Upon conclusion of this action, Defendant's attorneys shall return to government
6	counsel or destroy and certify to government counsel the destruction of all discovery documents
7	containing personal identifying information such as account numbers, Social Security numbers,
8	drivers license numbers, dates of birth, telephone numbers, Email addresses, and physical
9	addresses within a reasonable time, not to exceed thirty days after the statute of limitations
10	governing post-conviction petitions has expired.
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12	DANIEL G. BOGDEN United States Attorney
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14	/s/ Sarah E. Griswold BRIAN PUGH May 22, 2012 DATE
15	SARAH E. GRISWOLD Assistant United States Attorneys
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17	/s/ Mace J. Yamplolsky May 22, 2012
18	MACE J. YAMPOLSKY Counsel for Defendant
19	CANDIS J. GARDLEY
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21	ODDED
22	ORDER WE IS SO ORDERED II.
23	IT IS SO ORDERED this day of 2012.
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25	UNITED STATES DISTRICT JUDGE
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